

Exhibit 4

From: [Whitehead, Jamal](#)
To: [Kristin.Asai@hklaw.com](#); [Shannon.Armstrong@hklaw.com](#); [Matt.Donohue@hklaw.com](#)
Cc: [Andrew Free](#); [Berger, Adam](#); [Cronan, Sheila](#); [Devin Theriot-Orr](#); [Halm, Lindsay](#); [Meena Menter](#)
Subject: Nwauzor v. GEO - Deduplicating the Class List
Date: Thursday, June 6, 2019 2:57:00 PM
Attachments: [image001.png](#)
[RE Nwauzor v. The GEO Group \(W.D. Wash.\).pdf](#)

Hi Kristin, et al.:

This follows my email from May 1 and our phone call on May 7 about GEO's supplemental class list and whether GEO had more details about the address information provided. As you know, the list contained multiple addresses for many of the class members without indicating which address was the most recent or last, best address. You told me that GEO did not have this information and that ICE created the spreadsheet GEO produced.

We recently made the same inquiry with ICE and we received a response from the agency on Tuesday. Attached for your review is the entirety of our email exchange with ICE.

Based on the information we received from ICE, we plan to "deduplicate" the class list to identify the addresses associated with the most recent date found under any of the various date column headings on the supplemental class list (i.e., From date, To Date, EID Adr Create date, EID ADR Update date). From there, we will revisit Plaintiffs' notice plan and submitted an updated plan to the Court, as necessary.

Best,
Jamal



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